

**U.S. House of Representatives
Committee on Ways and Means
Subcommittee on Select Revenue Measures
April 26, 2012 - Hearing on Certain Expiring Tax Provisions**

Comments Submitted for the Record

The undersigned residents and property owners of the State of Massachusetts respectfully submit these comments in response to the April 26, 2012 Hearing on Certain Expiring Tax Provisions. Our comments are limited to the Production Tax Credit (PTC) for wind energy.

Executive Summary: The PTC is often credited for most of the growth in the wind sector but attributing market activity to the subsidy is overly simplistic and fails to consider other crucial factors driving development. When evaluated against key economic and environment criteria, the cost of the subsidy has proven excessive and the benefits to American taxpayers minimal. If the PTC were to expire, the economics of the industry would shift to States with renewable mandates. Power markets will ultimately confront the real cost of wind energy, and price it accordingly. The overall impact on the industry would be far less severe than proponents claim¹.

Supporting Statements:

High Cost: Since adopted in 1992, the cost of the PTC for wind energy has ballooned from \$5 million/year in 1998 to \$1.5 billion annually today. The open-ended subsidy of 2.2¢/kWh in after-tax income represents a pre-tax value of approximately 3.7¢/kWh. In many regions of the country the PTC now equals, or is greater than, the wholesale price of power. Even if the PTC were to sunset, taxpayers are still obligated to cover nearly \$10 billion in tax credits for wind projects built in the last decade. This is in addition to the \$15 billion debt for wind projects eligible under Section 1603 (including anticipated 2012 grants).

Inefficient: Since the PTC is uniform across the country it is highly inefficient, supporting poorly sited development in some areas while in other areas supporting projects that would have been built regardless of the credit. This is true in Texas and the Pacific Northwest where wind capacity exceeds transmission capacity and wind is curtailed². In New England the PTC likely pays more subsidy than is necessary owing to aggressive State mandates. Utilities in New England routinely sign long-term power contracts for wind at prices significantly above market.

Other factors advancing wind development: The industry insists it's at risk of a slow-down without the PTC. This view ignores other crucial factors driving development including state mandates and natural gas prices. It is not possible given available data to identify the extent to which the PTC has contributed to growth in the sector³. In fact, demand for wind has eroded recently due, in part, to

¹ Linowes et.al. 2012 Congressional Testimony <http://science.house.gov/hearing/subcommittee-investigation-and-oversight-subcommittee-energy-and-environment-%E2%80%93-joint-hearing>

² Wiser and Bolinger, 2010 *Wind Technologies Market Report*, (2011) vii <http://eetd.lbl.gov/ea/ems/reports/lbnl-4820e.pdf>

³ Joint Committee on Taxation, *Present Law And Background Relating To Tax Credits For Electricity Production From Renewable Sources* (2005) 14 <https://www.jct.gov/publications.html?func=startdown&id=1579>

states meeting their renewable mandates. Lower natural gas prices further reduced wind's attractiveness as a 'fuel saver'. The EIA now forecasts flat growth in the wind sector for this decade regardless of what happens with the PTC⁴.

Job losses: Despite billions in public funding the wind sector experienced a net loss of 10,000 direct and indirect jobs in 2010 bringing the total to 75,000⁵ jobs. Most of the remaining jobs are temporary construction positions requiring peak levels of development year-after-year to maintain current levels. Attempts to attribute job creation to the PTC must be tempered with corresponding job losses due to higher renewable energy prices. The State of Vermont found that adding just 50 MWs of renewable energy at higher-than-market electricity prices "had the deleterious effects of reshuffling consumer spending and increasing the cost of production for Vermont businesses⁶." Last year, rural electric ratepayers in Minnesota paid more than \$70 million in above-market energy prices due to the high cost of wind⁷.

Environmental benefits: Wind energy is an unpredictable, variable resource that cannot be relied on to serve load. Its primary benefit is in reducing U.S. electric carbon emissions. According the Navigant⁸, a four year extension of the PTC could avoid an incremental 170 million tons of CO₂. This "best case" estimate is not predicated on an actual working grid region, but if we accept Navigant's estimate the cost to taxpayers is at least \$23/ton CO₂⁹, ten-times the \$1.92/ton market price for offsets in the Northeastern states participating in RGGI! The PTC is a high-priced vehicle for very questionable reductions of CO₂ emissions.

Conclusion: The key question is whether the benefits of the PTC for wind are worth the cost. This 20-year old subsidy is expensive, inefficient, has failed to produce net-job increases that are sustainable, and the cost applied per ton of CO₂ is more than 10x the market price of carbon under RGGI. The U.S. power market has undergone significant change since the PTC was adopted, including deregulation. It is not possible to isolate the extent to which the PTC contributes to wind sector growth¹⁰. Without the PTC, project economics would shift to states with RPS policies. The value of renewable credits might rise in response but power markets will ultimately confront the real cost of wind energy, and price it accordingly.

⁴ EIA, *Annual Energy Outlook 2012* (2012) <http://www.eia.gov/forecasts/aeo/er/>

⁵ Wiser and Bolinger v - Note: No independent audits exist to confirm job counts. Since any new job in the electricity sector must contribute to increasing the cost of electricity, this creates economic de-stimulus.

⁶ VT DPS, *The Economic Impacts of Vermont Feed in Tariffs* (2009) 12
<http://publicservice.vermont.gov/planning/DPS%20White%20Paper%20Feed%20in%20Tariff.pdf>

⁷ Wall Street Journal *Gouged by the Wind* (May 2012)
http://online.wsj.com/article/SB10001424052702303592404577364244006391420.html?mod=googlenews_wsj

⁸ Navigant Consulting, Inc. *Impact of the Production Tax Credit on the U.S. Wind Market* (2011) 38

⁹ Navigant provides no detail on how it determined offsets. Study assumes some wind built without the PTC and only looked at incremental benefit over 4 years (2013-16). The cost per offset is potentially higher than \$23/ton.

¹⁰ Joint Committee on Taxation 14

Supplemental Sheet

Submitted by:

Janet Sinclair
28 Ashfield Street
Shelburne Falls, MA
413-625-2886

Date submitted: May 10, 2012

Comments submitted on behalf of the following residents and property owners of the State of Massachusetts.

Mercedes B. Aza 269 Country Club Way Kingston, MA 02364	Noel Abbott 112 Ford Hill Road Rowe, MA	Linda Ammons 194 Wales Road Brimfield, MA
Neil Andersen 211 Blacksmith Shop Rd East Falmouth, MA 02536	Faye Anderson 127 Bayside Road Quincy, MA 02171	Lynne Ballard 921 Bernardston Rd. Greenfield, MA 01301
Amy C. Barry 10 Laurel St. Shelburne Falls, Ma. 01370	Craig W. Barry Jr. 10 Laurel St. Shelburne Falls, Ma. 01370	Louise Barteau 5 Fishermans Rd. Fairhaven, MA 02719
Melissa Beesley 14 Bay Street Quincy, MA 02171	Claire Blatchford 286 Patten Road Shelburne , MA 01370	Ed Blatchford 286 Patten Road Shelburne , MA 01370
David Bolte 13 Carriage Drive Brimfield, MA 01010	Margaret Burke 62 Clarissa Joseph Road Plymouth, MA. 02360	Raymond Burke 62 Clarissa Joseph Road Plymouth, MA. 02360
Robert Cherdack 1180 Hawley Road Ashfield, MA 01330	Ann Christen 29 Sean Circle Brewster, MA 02631	Gary Christen 29 Sean Circle Brewster, MA 02631
Wayne Clough 29 Boxwood Lane Duxbury, MA 02332	Charles Cohn 226 Cooper Lane Shelburne, MA 01370	Mark J. Cool Falmouth Falmouth, MA
Barry C. Cosgrove 49 Blackmore Pond Circle Wareham, MA	Susan Cudnohufsky 455 Bug Hill Rd Ashfield, MA 01330	Walter Cudnohufsky 455 Bug Hill Rd Ashfield, MA 01330
Patricia J Culleney 84 North St Shelburne Falls, MA 01370	Dianna Dapkins 336 Patten Road Shelburne, MA 01370	Helen DeLuca 85 Bayside Rd. Quincy, MA

Joyce Doncaster
127 Bayside rd.
North Quincy, MA 02171

Don Dornback
42 Rodoalph Way
Dennis, MA

Joise Dornback
42 Rodoalph Way
Dennis, MA

Todd Drummey
360 Blacksmith Shop Road
East Falmouth, MA 02536

Donovan Drummey
360 Blacksmith Shop Road
East Falmouth, MA 02536

Terri Drummey
360 Blacksmith Shop Road
East Falmouth, MA 02536

Barbara Durkin
48 Moore Lane
Northboro, MA 01532

Bridget Earle
294 Smith Neck Rd
Dartmouth, MA 02748

Kathryn Elder
161 Blacksmith Shop Road
Falmouth, MA

Laurily K. Epstein
PO Box 554
Monterey, MA

Kristina Farren
85 Bayside Rd.
Quincy, MA

Sue Fraser Frankewicz
24 Highland Village
Shelburne Falls, MA 01370

Craig Gambee
160 Madaket Road
Nantucket, MA 02554

Mary Gambee
160 Madaket Road
Nantucket, MA 02554

Clark Goff
30 Tea Lane
Chilmark, MA. 02535

Pamela S. Goff
30 Tea Lane
Chilmark, MA 02535

Louise Grabowski
164 Crabtree Rd.
Quincy, MA 02171

Lilli-Ann Green
45 Tim Way Rd
Wellfleet,, MA

Frank Haggerty
126 Brandt Island Road
Mattapoisett, MA

Walter J Hannon III
202 Parke Ave.
Quincy, MA

Annie Hart Cool
Falmouth
Falmouth, MA

Raymond S. Hartman M.D.
52 Greylock Road
Newton, MA

Roland Hesselbart
73 Burrington Rd
Heath, MA 01346

Maureen Hickey
66 Woodbury St
S Hamilton, MA 01982

Lamia Holland
34 Ashfield St.
Shelburne Falls, MA 01370

Nancy Holland
19 Mechanic Street
Shelburne Falls, MA

Virginia Irvine,
1023 Dunhamtown-Brimfield
Road
Brimfield, MA
Thomas Kehoe
34 Severance St.
Shelburne Falls, Ma 01370

Judy Isacoff
East St
Mt. Washington, MA 01258

Robert Jaros
360 Patten Road
Shelburne, MA 01370

Ken Kipen
P.O. Box 183
Ashfield , MA 01330

Wayne Klug, Ph.D.
PO 830
Lanesboro, MA

Dan Knise
30 Douglas Way
Nantucket, MA 02554

Kathi Knise
30 Douglas Way
Nantucket, MA 02554

Dale Ms. LaBonte
1023 Dunhamtown-Brimfield
Road
Brimfield, MA

Ellen Landauer
87 Warner Hill Rd.
Charlemont, MA

Aaron LaPointe
9 W Gill Rd
Gill, MA 01354

Wendy LaPointe
9 W Gill Rd
Gill, MA 01354

Daniel F. LaRose
284 Patten Rd
Shelburne, MA 01307

Kathryn G. LaRose
284 Patten Rd
Shelburne, MA 01307

Herbert A. Libby
135 East Buckland Road
Buckland, MA

Julia Lindner
1 Massasoit Bridge Road
Nantucket, MA

Bob Liptak
17 Jonathan's Way
Brewster, MA

Jeanne Liptak
17 Jonathan's Way
Brewster, MA

Laurie MacLeod
136 Old Albany Road
Greenfield, MA 01301

Charles Maier
87 Warner Hill Rd
Charlemont, MA 01339

Bruce Mandel
10 Midland Avenue
Nantucket, MA 02554

Madi McClanahan
323 Black Brook Road
Savoy, MA

Noel McClanahan
323 Black Brook Road
Savoy, MA

Peter McClanahan
323 Black Brook Road
Savoy, MA

Preston McClanahan
323 Black Brook Road
Savoy, MA

Joyce P. McConnell
Brewster, MA

Connie S. McCreery
316 South Road
Chilmark , MA

Maxwell R. McCreery
316 South Road
Chilmark , MA

James Melnik
4 Highland Village
Shelburne Falls, MA 01370

Priscilla Mitchell
1024 Dunhamtown Road
Brimfield, MA

Jane Myers
100 Pudding Hollow Road
Hawley, MA

Maryellen Nissen
20 Kent Rd
Brewster, MA 02631

Michael Nissen
20 Kent Rd
Brewster, MA 02631

Phyllis Ormond
15 Tower Rd
.Shelburne, MA 01370

Richard Ormond
15 Tower Rd.
Shelburne, MA 01370

Harriet Paine
3 South Maple Street
Shelburne Falls, MA 01370

Arleen Parker
19 Settler's Dr
Lakeville, Ma 02347

Dan Parker
19 Settler's Dr
Lakeville, Ma 02347

Helen Parker
300 North Road
Chilmark, MA 02535

J.B. Riggs Parker
300 North Road
Chilmark, MA

Barbara Parry
307 Patten Rd.
Shelburne, Ma. 01370

Mike Parry
307 Patten Rd.
Shelburne, Ma. 01370

David Patrick
360 Patten Rd
Shelburne Falls, MA 01370

Carol Platenik
45 Saint Clair Road
Brimfield, MA 01010

Lauren Preston-Wells
30 Bailey Rd
Shelburne Falls, MA 01370

Donna M. Reilly
135 North St.
Shelburne Falls, MA

Mr. Jamie Reinhardt
53 New State Road
Savoy, MA 01256

Mitchell Relin
36 White Oak Trail
Brewster, MA

Yvonne Relin
36 White Oak Trail
Brewster, MA

Preston Ribnick
160 Old County Rd
S. Wellfleet, MA

Margaret Ronan
52 Essex St
Quincy, MA 02171

Marshall Rosenthal
398 Loop Rd
Savoy, MA

Susan Rosenthal
398 Loop Rd
Savoy, MA

Frank Rozelle
21 Church Street
Shelburne Falls, Mass 01370

Stephen Ryack
18 Hosmer Rd.
E. Heath, MA 01346

John F. Sears
100 Pudding Hollow Road
Hawley, MA

Kathleen A. Sherman PhD
#30 Colonial Way
Brewster, MA 02645

Janet Sinclair
28 Ashfield Street
Shelburne Falls, MA

Elizabeth Smola MD
Dunhamtown Road
Brimfield, MA

Cameron M. Snyder
40 Reservoir Park Dr.
Rockland, MA 02370

Robert J Stack
5 Little Pine Lane
Plymouth, MA 02360

Marie Stamos
22 Sonoma Road
Squantum, MA 02171

Mrs. James Stamos
22 Sonoma Road
Squantum, MA 02171

Jerome Sternstein
73 Pudding Hollow Road
Hawley, MA

Kathryn Sternstein
73 Pudding Hollow Road
Hawley,, MA

Edward Stockman
131 Summit Street
Plainfield, MA 01070

Debra Sullivan
75 State St.
Shelburne Falls, MA 01370

Joan Swaluk
76 Quasons Path
Brewster, MA 02631

Joe Swaluk
76 Quasons Path
Brewster, MA 02631

Kristen Swenson
106 Middletown Hill Road
Rowe, MA 01367

Phillip Tedesco
50 Old Village Rd
Shleburne Falls, MA 01370

Jeanne Thompson
4 High Street
Haydenville, MA 01039

Richard Todd
PO Box 293
Ashfield, MA 01330

Elizabeth Tolini
31 Bayside Rd.
N.Quincy, MA 02171

Mark Tolini
31 Bayside Rd.
N.Quincy, MA 02171

Jo Travis
156 Flagg Hill Road
Heath, MA 01346

Dale Truesdell
178 Patten Road
Shelburne Falls, MA 01370

Judith Truesdell
178 Patten Road
Shelburne Falls, MA 01370

Kay Turgeon
14 Morning Mist Lane
Buzzards Bay, MA

Nancy L Turgeon
89 Lewis Bay Road Unit 304
Hyannis, MA 02601

Richard Turgeon
14 Morning Mist Lane
Buzzards Bay, MA

Joyce Vande Kieft
107 Skinner Road
Shelburne Falls, MA 01370

Andrew Wells
30 Bailey Rd
Shelburne Falls , MA 01370

Albert K. Weyman MD
41 Consodine Road
Brewster, MA 02631

Victoria Worth
457 Steady Lane
Ashfield, MA 01330

Stephen Worth
457 Steady Lane
Ashfield, MA 01330

George Zebrowski
950 Shaw Road
Windsor, MA 01270

Marsha Zebrowski
950 Shaw Road
Windsor, MA 01270

Richard A. Zona
17 D Street
North Adams, MA 01247

Green Berkshires
PO Box 342
Great Barrington, MA

Patrick Devlin
921 Bernardston Rd.
Greenfield, MA 01301

John DeLuca
85 Bayside Rd.
Quincy, MA

Marie DeLuca
85 Bayside Rd.
Quincy, MA